

## **EXHIBIT 9**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

EPLUS, INC.,

Plaintiff,

v.

PERFECT COMMERCE, INC.,  
SCIQUEST, INC., LAWSON  
SOFTWARE, INC., and VERIAN  
TECHNOLOGIES, INC.,

Defendants.

Civil Action No. 2:09-CV-232-HCM-TEM

**DEFENDANT LAWSON SOFTWARE, INC.'S RESPONSES TO EPLUS, INC.'S FIRST  
SET OF INTERROGATORIES (NOS. 1-14)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Lawson Software, Inc., ("Lawson") hereby responds to Plaintiff ePlus, Inc.'s ("ePlus") First Set of Interrogatories (Nos. 1-14) as set forth below.

**GENERAL OBJECTIONS**

1. Lawson generally objects to ePlus's interrogatories to the extent they seek to impose upon Lawson any obligations different from, or in addition to, those obligations imposed by the Federal Rules of Civil Procedure or the Civil Local Rules. Lawson's responses shall be controlled by the requirements imposed by the Federal Rules of Civil Procedure, Federal Rules of Evidence or the applicable Local Rules.

**INTERROGATORY NO. 4:**

State in detail all facts and contentions that support or refute Lawson's allegations, if any, that any of the patents in suit are invalid under 35 U.S.C. §§ 102 or 103, identifying all prior patents, literature, publications, systems, processes, or devices, including prior knowledge, public uses, sales and offers for sale, that Lawson contends, either alone or in combination, invalidate one or more claims of any of the patents in suit, through a claim chart that identifies each element of each claim of the patent(s) asserted to be invalid and explains where each element of the respective claim is shown in such prior patent, literature, publications, system, process, device, public use, sale, or offer for sale.

**OBJECTION TO INTERROGATORY NO. 4:**

Lawson objects to Interrogatory No. 4 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects that this interrogatory is vague, ambiguous, unduly burdensome and compound. Lawson further objects to this interrogatory as a premature contention interrogatory, and an improper attempt to take expert discovery.

**RESPONSE TO INTERROGATORY NO. 4:**

Subject to and without waiving its objections, Lawson responds that the patents-in-suit are either anticipated or rendered obvious by at least one or more of the following prior art references and systems:

U.S. Patent No. 5,319,542  
U.S. Patent No. 5,694,551  
U.S. Patent No. 6,712,989  
U.S. Patent No. 5,361,199  
U.S. Patent No. 5,666,493  
U.S. Patent No. 4,992,940  
U.S. Patent No. 5,402,336  
TV/2 General Information Manual

The Electronic Catalog Market: Status and Directions, (c) 1994 by INPUT  
Electronic Commerce: Comprehensive Market Assessment, (c) 1992 by INPUT  
J-CON  
SABRE  
P.O. Writer  
GATEWAY/2000 or GATEWAY/DOS  
Lawson Software  
R/2  
R/3  
Movex  
Mapics  
REALITY  
RIMS  
TV/2  
Nova DOS  
Matkon  
APS DOS  
Condor  
CARMS  
Triad (CCD)  
PMX-2  
FAST  
Palmas Purchasing+  
EZ MRP  
PurchasePro  
StockPro  
ASAP (Baxter)  
COACT+ (J&J)  
SPEC 2000  
IDB 2000  
APOLLO

In addition, Lawson believes that relevant prior art exists at the following companies:

International Business Machines Corporation  
Lockheed Martin Corporation  
McKesson Corporation

In addition, for additional information responsive to this interrogatory, ePlus may refer to documents produced by Lawson relating to Reexamination Control Nos. 90/008,104 and 95/000,487.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

**INTERROGATORY NO. 5:**

For each of the claims of the patents in suit, state whether Lawson contends, or will contend at trial, that such claim is invalid under 35 U.S.C. § 112 and provide a detailed explanation of each fact relating to any such contention and, with respect to each fact or contention, an explanation of why such fact or contention would render the patent claim invalid under Section 112.

**OBJECTION TO INTERROGATORY NO. 5:**

Lawson objects to Interrogatory No. 5 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects to this interrogatory as a premature contention interrogatory, and an improper attempt to take expert discovery.

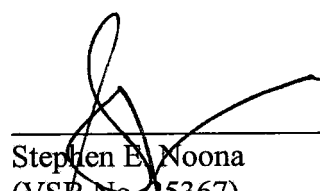
**RESPONSE TO INTERROGATORY NO. 5:**

Lawson reserves the right to supplement its response to this interrogatory as necessary at the appropriate time, but not before ePlus specifically identifies which claims it asserts and its contentions as to the meaning of those claims.

**INTERROGATORY NO. 6:**

For each claim of each of the patents in suit, state whether Lawson contends or will contend at trial that such claim is invalid under any statute, rule or doctrine other than 35 U.S.C. §§ 102, 103 and/or 112 and, if so, identify the statute(s), rule(s) or doctrine(s) and provide a

Dated: August 24, 2009



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Stephen E. Noona  
(VSB No. 45367)  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
senoona@kaufcan.com

*Counsel for Defendant Lawson Software, Inc.*

Daniel Johnson, Jr. (admitted *pro hac vice*)  
Rita E. Tautkus (admitted *pro hac vice*)  
Morgan, Lewis & Bockius LLP  
One Market, Spear Street Tower  
San Francisco, CA 94105-1596  
Telephone: (415) 442-1000  
Facsimile: (415) 442-1001  
djjohnson@morganlewis.com  
rtautkus@morganlewis.com

Robert W. Busby, Jr.  
(VSB No. 41312)  
Bradford A. Cangro (admitted *pro hac vice*)  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Ave., NW  
Washington, DC 20004-2541  
Telephone: (202) 739-3000  
Facsimile: (202) 739-3001  
rbusby@morganlewis.com  
bcangro@morganlewis.com

*Counsel for Defendant Lawson Software, Inc.*

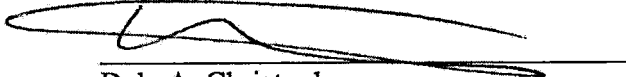
As to the foregoing responses:

**VERIFICATION**

I, Dale A. Christopherson herein state that:

1. I am authorized to execute this Verification on behalf of Lawson Software, Inc. ("Lawson").
2. I have read Lawson's Responses to ePlus, Inc.'s First Set of Interrogatories (Nos. 1-14) and am familiar with its contents. I hereby declare under penalty of perjury that the answers set forth in that document are true and correct to the best of my knowledge, information and belief.

Dated: 08/24/2009

  
Dale A. Christopherson

**CERTIFICATE OF SERVICE**

I hereby certify that on August 24, 2009, a true and correct copy of the foregoing document was served by electronic mail upon counsel for the plaintiff:

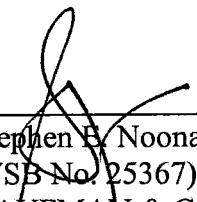
Gregory N. Stillman  
Brent Lee VanNorman  
Hunton & Williams  
500 East Main Street, Suite 1000  
Norfolk, VA 23510  
Tel.: 757-640-5300  
Fax.: 757-625-7720  
gstillman@hunton.com  
bvannorman@hunton.com

Scott L. Robertson  
Jennifer A. Albert  
David M. Young (VSB No. 35997)  
Robert D. Spendlove (VSB No. 75468)  
Goodwin Procter, LLP  
901 New York Avenue, N.W.  
Washington, DC 20001  
Tel.: 202-346-4000  
Fax.: 202-346-4444  
srobertson@goodwinprocter.com  
jalbert@goodwinprocter.com  
dyoung@goodwinprocter.com  
rspendlove@goodwinprocter.com

Shirley Sperling Paley  
James D. Clements  
Goodwin Procter, LLP  
Exchange Place  
53 State Street  
Boston, MA 02109-2881  
Tel.: 617-570-1000  
Fax.: 617-523-1231  
spaley@goodwinprocter.com  
jclements@goodwinprocter.com

*Attorneys for Plaintiff*





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Stephen E. Noona  
(VSB No. 25367)  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
senoona@kaufcan.com

*Counsel for Defendant Lawson Software, Inc.*

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